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Attorneys for Plaintiff
OWEN DIAZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;
CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES, INC.;
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**DECLARATION OF CIMONE NUNLEY
IN SUPPORT OF PLAINTIFF'S
MOTIONS *IN LIMINE* NOS. 1-6**

Date: May 11, 2020

Time: 10:00 a.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: June 8, 2020

Complaint filed: October 16, 2017

1 I, LAWRENCE ORGAN, hereby declare:

2 1. I am an attorney licensed to practice law in the State of California. I am an
3 attorney with the law firm of California Civil Rights Law Group, attorneys of record for Plaintiff
4 Owen Diaz in this action. I submit this Declaration in support of Plaintiff's Motions *in Limine*
5 Nos. 1-6. I have personal knowledge of the facts stated herein and if called upon to testify, I
6 could and would competently testify thereto, except as to those matters that are stated upon
7 information and belief.
8

9 2. Attached hereto and marked as Exhibit 1 is a true and correct copy of various
10 excerpts from the deposition of Tamotsu Kawasaki.

11 3. Attached hereto and marked as Exhibit 2 is a true and correct copy of various
12 excerpts from the deposition of Michael Wheeler.
13

14 4. Attached hereto and marked as Exhibit 3 is a true and correct copy of various
15 excerpts from the deposition of Wayne Jackson.

16 5. Attached hereto and marked as Exhibit 4 is a true and correct copy of various
17 excerpts from the deposition of Annalisa Heisen.
18

19 6. Attached hereto and marked as Exhibit 5 is a true and correct copy of various
20 excerpts from the deposition of Erin Marconi.

21 7. Attached hereto and marked as Exhibit 6 is a true and correct copy of Defendant
22 Tesla, Inc. dba Tesla Motors, Inc.'s Initial Discovery Information Pursuant to General Order No.
23 71 in this matter.
24

25 8. Attached hereto and marked as Exhibit 7 is a true and correct copy of Defendant
26 Tesla Inc.'s Responses to Plaintiff Owen Diaz' Interrogatories—Set One.
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1 9. Attached hereto and marked as Exhibit 8 is a true and correct copy of Defendant
2 Tesla, Inc. dba Tesla Motors, Inc.'s Response to Plaintiff Owen Diaz's Interrogatories, Set
3 Three.

4 10. Attached hereto and marked as Exhibit 9 is a true and correct copy of a
5 Declaration of Non-Service for a Subpoena to Testify at a Deposition in a Civil Action and
6 Plaintiff Owen Diaz's Notice of Deposition of Ramon Martinez.

7 11. Attached hereto and marked as Exhibit 10 is a true and correct copy of various
8 excerpts from the deposition of Veronica Martinez.

9 12. Attached hereto and marked as Exhibit 11 is a true and correct copy of a
10 document produced by former Defendant Citistaff Solutions, Inc. in this action and Bates-
11 stamped CITISTAFF-0000001 to CITISTAFF-0000005.

12 13. Attached hereto and marked as Exhibit 12 is a true and correct copy of a
13 document produced by former Defendant Citistaff Solutions, Inc. in this action and Bates-
14 stamped CITISTAFF-0000011 to CITISTAFF-0000013.

15 14. Attached hereto and marked as Exhibit 13 is a true and correct copy of documents
16 produced by Defendant Tesla, Inc. in this action and Bates-stamped TESLA-001051 to TESLA-
17 0001116.

18 15. Attached hereto and marked as Exhibit 14 is a true and correct copy of a
19 Certificate of Service created by counsel for Defendant Tesla, Inc. in this action for the service of
20 documents Bates-stamped TESLA-001051 to TESLA-0001116

21 I declare under penalty of perjury under the laws of the United States of America that the
22 foregoing is true and correct. Executed on April 20, 2020 in Sacramento, California.
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1
2 DATED: April 20, 2020

By: 

Lawrence A. Organ, Esq.
Navruz Avloni, Esq.
J. Bernard Alexander, Esq.
Cimone A. Nunley, Esq.
Attorneys for Plaintiff
OWEN DIAZ